

Margaret J. Vick, PLC

140 E. Rio Salado Pkwy #607
Tempe, AZ 85281

602 814 7666
Fax: 866 712 1714
mjvick@gmail.com

January 10, 2013

Darrick Moe
Desert Southwest Regional Manager
Western Area Power Administration
P.O. Box 6457
Phoenix, AZ 85005-6457

Sent via fax to: 602.605.2490

Dear Mr. Moe:

I am counsel to the Havasupai Tribe and am submitting these comments on their behalf.

The Havasupai Tribe is a Native American Indian tribe as defined in the Indian Self Determination Act of 1975 and eligible to participate in the Hoover Power Reallocation. The Havasupai Tribe joins in and supports the comments submitted by the Inter Tribal Council of Arizona, Inc., incorporates my comments to Mike Simonton on October 3, 2012 on behalf of the Havasupai Tribe and provides the following additional comments.

The Havasupai Tribe supports the publication of proposed marketing criteria prior to requesting submission of applications.

The Hoover Power Allocation Act of 2011 requires allocation of power to Indian Tribes under direct contract with Western. The Havasupai Tribe agrees with the Western interpretation that the Act creates a priority for Indian Tribes for allocation from the pool for New Entities. Allocations must be made to Tribes prior to any requirements for determination of minimums.

The Havasupai Tribe supports the opportunity to enter benefit arrangements after allocations are made. Any process that requires aggregation or benefit contracting prior to allocation is contrary to the requirements of the Hoover Power Allocation Act and would make the process practically impossible to implement.

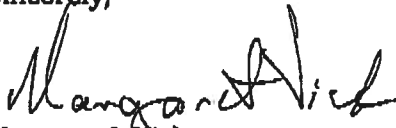
The Havasupai Tribe does not have utility status and supports the exception for Native American tribes from the requirement of utility status.

Mr. Moe
Jan. 10, 2013
Page 2

The Havasupai Tribe does not accept the Western requirement of 1000kW minimum allocations and joins in the ITCA comments on this topic.

Thank you for your consideration of these comments.

Sincerely,



Margaret J. Dick

Cc: Don Watahomigie, Chairman
Matthew Putesoy, Vice Chairman
Patrick McMullen, ITCA